

Fill in this information to identify the case:

Debtor 1 Donna M. Brennan

Debtor 2
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PACase number 19-03433 MJC**Form 4100R****Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: PNC BANK NATIONAL ASSOCIATION

Court claim no. (if known): 5

Last 4 digits of any number you use to identify the debtor's account: 7744

Property address:

160 Old Route 940
Pocono Lake, PA 18347**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____**Part 3: Postpetition Mortgage Payment**

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:	(a)	\$ <u>2,151.86</u>
b. Total fees, charges, expenses, escrow, and costs outstanding:	+ (b)	\$ <u>0.00</u>
c. Total. Add lines a and b.	(c)	\$ <u>2,151.86</u>

Creditor asserts that the debtor(s) are contractually obligated for 11 / 03 / 2024
the postpetition payment(s) that first became due on:

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Brent J. Lemon

Date 12/17/2024

Brent Lemon
17 Dec 2024, 15:51:27, EST

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Donna M. Brennan aka Donna
Maria Brennan**

Debtor(s)

**PNC BANK NATIONAL
ASSOCIATION**

Movant

vs.

**Donna M. Brennan aka Donna Maria
Brennan**

Debtor(s)

Jack N. Zaharopoulos,

Trustee

BK NO. 19-03433 MJC

Chapter 13

Related to Claim No. 5

**CERTIFICATE OF SERVICE
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Brent J. Lemon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on December 17, 2024, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Donna M. Brennan aka Donna Maria Brennan
160 Old Route 940
Pocono Lake, PA 18347

Attorney for Debtor(s) (via ECF)

Kim M. Diddio, Esq.
17 North 6th Street
Stroudsburg, PA 18360

Trustee (via ECF)

Jack N. Zaharopoulos
8125 Adams Drive
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail

Dated: December 17, 2024

/s/ Brent J. Lemon

Brent J. Lemon
Attorney I.D. 86478
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
(412) 475-8764
blemon@kmlawgroup.com

Account History:

Borrower:	BRENNAN,DONNA	Mail Addr 1:		Commitment:	\$0 00	Prin Bal:	\$100,280 21
Co-Borrower Name:		Mail Addr 2:		Available Line Remaining:	\$0 00	Last Pmt Appd On:	11/20/2024
Loan Purpose:	Refinance Equity Takeout	Mail Street:	160 OLD ROUTE 940	Rate:	Fixed	Num Of Segments:	1
Investor #:		Mail City:	POCONO LAKE	Period:	Closed Control	Account Type:	Consumer Loan
Total Pmt Amt:	\$1,075 93	Mail State:	PA	Investor Type:	Other	PLS Client ID:	
Bill Date:	01/06/2025	Mail Zip Code:	18347-7770	Mail Carrier Route:		Due Date:	11/03/2024

Request Criteria: Type = All, Date Range = From 12/10/2023 To 12/10/2024

Row Count = 64

Transaction Description	Applied Dt	Due Date	Payment	Principal Applied	Interest Applied	Escrow Applied	Esc Bal	Adv Bal	Suspense Applied	Corp Adv Applied	L/C Amt Applied	Fee Amt Applied	Fee Cd
Funds Application	11/20/2024	10/03/2024		\$433 74	\$642 19								
Funds Application	11/20/2024	10/03/2024							-\$1,075 93				
Modified Payment	11/19/2024	10/03/2024	\$1,075 93						\$1,075 93				
Funds Application	09/17/2024	09/03/2024		\$407 32	\$668 61								
Funds Application	09/17/2024	09/03/2024							-\$1,075 93				
Modified Payment	09/16/2024	09/03/2024	\$1,075 93						\$1,075 93				
Modified Payment	08/14/2024	08/03/2024		\$465 92	\$610 01								
Modified Payment	08/14/2024	08/03/2024	\$1,075 93										
Funds Application	08/07/2024	07/03/2024		\$419 97	\$655 96								
Funds Application	08/07/2024	07/03/2024							-\$1,075 93				
Funds Application	08/06/2024	06/03/2024		\$417 49	\$658 44								
Funds Application	08/06/2024	06/03/2024							-\$1,075 93				
Funds Application	08/06/2024	06/03/2024							-\$645 54		\$645 54		
Misapplication Reversal	08/05/2024	06/03/2024											
Misapplication Reversal	08/05/2024	06/03/2024		-\$417 49	-\$638 79				\$1,056 28				
Misapplication Reversal	08/05/2024	07/03/2024							\$645 54		-\$645 54		
Modified Payment	07/15/2024	07/03/2024	\$1,075 93						\$1,075 93				
Funds Application	07/08/2024	07/03/2024							-\$645 54		\$645 54		
Funds Application	07/08/2024	06/03/2024		\$417 49	\$638 79								
Funds Application	07/08/2024	06/03/2024							-\$1,056 28				
Funds Application	06/26/2024	05/03/2024		\$435 13	\$640 80								
Funds Application	06/26/2024	05/03/2024							-\$1,075 93				
Funds Application	06/25/2024	05/03/2024	\$716 13						\$716 13				
Funds Application	06/25/2024	05/03/2024	\$116 44						\$116 44				
Funds Application	06/14/2024	04/03/2024		\$451 65	\$624 28								
Funds Application	06/14/2024	04/03/2024							-\$1,075 93				
Modified Payment	06/13/2024	04/03/2024	\$1,075 93						\$1,075 93				
Funds Application	05/15/2024	03/03/2024		\$383 29	\$692 64								
Funds Application	05/15/2024	03/03/2024							-\$1,075 93				
Modified Payment	05/14/2024	03/03/2024	\$1,075 93						\$1,075 93				
Funds Application	04/23/2024	03/03/2024	\$791 33						\$791 33				
Funds Application	04/23/2024	03/03/2024	\$128 67						\$128 67				
Funds Application	04/16/2024	02/03/2024		\$421 00	\$654 93								
Funds Application	04/16/2024	02/03/2024							-\$1,075 93				
Modified Payment	04/15/2024	02/03/2024	\$1,075 93						\$1,075 93				
Statutory Exp Corp Adv	03/26/2024									\$0 64			
Statutory Exp Corp Adv	03/26/2024									\$0 64			
Statutory Exp Corp Adv	03/26/2024									\$7 00			
Funds Application	03/21/2024	01/03/2024		\$417 65	\$658 28								
Funds Application	03/21/2024	01/03/2024							-\$1,075 93				
Funds Application	03/20/2024	01/03/2024	\$573 71						\$573 71				
Funds Application	03/20/2024	01/03/2024	\$93 29						\$93 29				
Funds Application	03/14/2024	12/03/2023		\$391 88	\$684 05								
Funds Application	03/14/2024	12/03/2023							-\$1,075 93				
Modified Payment	03/13/2024	12/03/2023	\$1,075 93						\$1,075 93				
Funds Application	02/21/2024	11/03/2023		\$409 35	\$666 58								
Funds Application	02/21/2024	11/03/2023							-\$1,075 93				
Funds Application	02/20/2024	11/03/2023	\$1,147 43						\$1,147 43				
Funds Application	02/20/2024	11/03/2023	\$186 57						\$186 57				
Funds Application	02/15/2024	10/03/2023		\$340 50	\$735 43								
Funds Application	02/15/2024	10/03/2023							-\$1,075 93				
Modified Payment	02/14/2024	10/03/2023	\$1,075 93						\$1,075 93				

Funds Application	01/22/2024	10/03/2023	\$573 71						\$573 71				
Funds Application	01/22/2024	10/03/2023	\$93 29						\$93 29				
Funds Application	01/17/2024	09/03/2023		\$425 12	\$650 81								
Funds Application	01/17/2024	09/03/2023							-\$1,075 93				
Modified Payment	01/16/2024	09/03/2023	\$1,075 93						\$1,075 93				
Funds Application	12/27/2023	08/03/2023		\$398 30	\$677 63								
Funds Application	12/27/2023	08/03/2023							-\$1,075 93				
Funds Application	12/26/2023	08/03/2023	\$573 71						\$573 71				
Funds Application	12/26/2023	08/03/2023	\$93 29						\$93 29				
Funds Application	12/15/2023	07/03/2023		\$348 74	\$727 19								
Funds Application	12/15/2023	07/03/2023							-\$1,075 93				
Modified Payment	12/14/2023	07/03/2023	\$1,075 93						\$1,075 93				